

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

BENJAMIN MOSTAED, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

JAMES B. CRAWFORD, ROBERT H.  
FOGLESONG, RICHARD M. GABRYS,  
ROBERT B. HOLLAND, BOBBY R.  
INMAN, DAN R. MOORE, BAXTER F.  
PHILLIPS, JR., STANLEY C. SUBOLESKI,  
LINDA J. WELTY, MASSEY ENERGY  
COMPANY, and ALPHA NATURAL  
RESOURCES, INC.,

Defendants.

Civil Action No. 3:11-cv-00079-REP

**CLASS ACTION**

**DECLARATION OF SHAWN E.  
FIELDS IN SUPPORT OF  
PLAINTIFF BENJAMIN  
MOSTAED'S MOTION FOR  
APPOINTMENT AS LEAD  
PLAINTIFF AND APPROVAL OF  
HIS SELECTION OF LEAD AND  
LIAISON COUNSEL**

I, Shawn E. Fields, declare as follows:

1. I am an associate at Johnson & Weaver, LLP, and counsel for Plaintiff Benjamin Mostaed ("Plaintiff"). I have personal knowledge of the facts stated below. If called upon to do so, I could and would completely testify thereto:

2. Attached as **Exhibit A** is a true and correct copy of the notice published on *Business Wire* on May 23, 2011, by Plaintiff in this action.

3. Attached as **Exhibit B** is a true and correct copy of the certification signed by Plaintiff stating that he is willing to serve as the representative party on behalf of the Class, as well as an attachment to this certification documenting his purchase of 1,250 shares of Massey Energy Company common stock.

4. Attached as **Exhibit C** is a true and correct copy of Johnson & Weaver, LLP's resume.

5. Attached as **Exhibit D** is a true and correct copy of Finkelstein Thompson, LLP's resume.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 22nd day of July, 2011, at San Diego, California.

A handwritten signature in black ink, appearing to read 'SEF', is written above a horizontal line.

SHAWN E. FIELDS